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175 East Old Country Road,
Hicksville, New York
EPA ID #: NYD006866008

NYSDEC: Environmental Compliance Department: (516) 949-8599

Minor Permit Modification

1.0 INTRODUCTION

This Contingency Plan has been developed for Long Island Electric Utility ServCo LLC (ServCo), (PSEG LI) and its Treatment Storage and Disposal Facility (TSDF) located at the Hicksville Operations Center at 175 E. Old Country Road, Site A, in Hicksville, New York. The Contingency Plan has been written to be a standalone document as well as to be part of ServCo's 6NYCRR Part 373 Permit application. The plan is designed to minimize hazards to human health and the environment by establishing notification, mobilization and remedial action procedures to be implemented during an emergency. The types of emergencies that are specifically addressed are those resulting from fires, spills or explosions in the areas used to handle and store wastes. Further, the plan fulfills the requirements of the New York State regulations (6 NYCRR Subpart 373-3.4).

All TSDF employees whose routine job function entails hazardous waste handling or management will be familiar with this Contingency Plan. Actions include response to fires, explosions, or unplanned sudden or non-sudden releases of hazardous or non-hazardous waste and/or waste constituents to the air, soil and surface or subsurface water at the TSDF. Emergencies related to hazardous and non-hazardous waste are covered by this plan. This plan supplements the Hicksville Emergency Action Plan.

The purpose of the Hicksville Emergency Action Plan is to provide the user with an overview of the Hicksville Facility. It includes a description of the property, the alarm systems, the emergency notifications and organizational structure. Facility floor plans indicating emergency escape routes and maps showing the location of the Incident Command post and designated assembly areas are provided. The procedures in the Plan present specific instructions on what actions to take during an emergency. Included are instructions for employees of the Hicksville facility and the various operating groups. The plan is implemented by Safety personnel who will contact the Emergency Coordinators listed in this TSDF Contingency Plan if the emergency involves wastes stored in the TSDF.

The Contingency Plan has been written to address the hazardous waste management units at the TSDF and for the storage of non-hazardous waste. Non-hazardous used oil storage, mineral oil recycling (dielectric fluids) and non-hazardous waste management activities are included in this plan. The waste units included in this plan are as follows:

- * RCRA Drum Storage Facility
- * Annex III - PCB Storage Building
- * PCB Storage Area

* Non-hazardous Waste Management units

3.0 DESCRIPTION OF FACILITIES

The total site encompasses approximately 78 acres, only a small portion of which houses waste management facilities. The types of waste and the maximum storage capacities of hazardous waste stored in each facility are provided on Table 1 in the Attachments. Table 1A describes the non-hazardous waste management units and shows the storage capacities of non-hazardous used oils and oils associated with the oil recycling operations located in the PCB Storage Area. A description of the facilities is provided below.

RCRA Drum Storage Facility

The RCRA Drum Storage Facility is for the storage of hazardous and non-hazardous waste in containers. The storage facility is constructed of concrete and cinder block and is divided into six individual compartments. Each compartment has a storage capacity of 6 fifty-five gallon drums or containers. Each compartment is a segregated unit and separated from others by a concrete block wall. Isolated spill containment is provided by a sump under each compartment to eliminate the possibility of incompatible waste from different compartments mixing in the event of a leaking or ruptured container.

Incompatible waste material is segregated by compartment. Each of the compartments has a gate and the hazard class of the wastes contained in the compartment is identified by placard on the front of each gate. An additional area located in the front portion of the facility is used for pallet storage of waste. The hazardous waste typically stored at the RCRA Drum Storage Facility includes corrosives, nonflammable paints and paint related material, laboratory chemicals, waste oils, halogenated and non-halogenated solvents, RCRA metals contaminated materials, and lab packed material. Non-hazardous waste stored in this facility consists of spill liquids, dirt/debris, greases, sump wastes, oils and process waste. The entire RCRA Drum Storage Area is covered by a permanent roof. This includes the storage compartments, the truck unloading/storage area and the working area in front of the storage compartments. All drums and waste handling activities are protected from precipitation and the entire area is protected from run-on and run-off. The concrete floor of the facility is coated with an epoxy coating approved by Nassau County Department of Health.

The RCRA **Drum Storage** Facility also has pallet storage for containers (drums) and an enclosed storage unit for the storage of universal waste (batteries, fluorescent and HID lamps). The fluorescent and HID lamps are maintained in containers in the enclosed storage unit. Each container can contain approximately 170 lamps.

The capacity for the drum storage area is for sixty (60) 55-gallon containers or 3,300 gallons. Smaller containers or pallet storage may also be used.

3.2 Annex III PCB Storage Facility

The Annex III PCB Storage Facility consists of a prefabricated 40' x 78' building used for the storage of PCB contaminated hazardous waste and non-hazardous waste. This facility is equipped with an automatic fire alarm and foam fire suppression system. Hazardous wastes (greater than 50 ppm PCBs) stored in this building include PCB articles, drummed PCB contaminated solids, drummed dielectric fluid containing greater than 50 ppm PCBs, transformers containing or previously containing greater than 50 ppm PCBs, and other miscellaneous PCB containing waste streams. Non-hazardous wastes stored at this facility include spill liquid, dirt/debris, non-hazardous waste waters and PCB contaminated waste less than 50 ppm PCB.

The concrete floor of the waste management unit is diked for containment and coated. Containers holding wastes are stored on the floor. The total capacity for storage is as shown in Table 1. Since storage may at times consist of large equipment or small containers, the container number will be adjusted accordingly to maintain the volume capacity of gallons. Adjacent to the Annex building on the south side is a concrete slab for the storage of 10-20 yd³ roll-off containers. The roll-off containers are used to store bulk non-haz oily contaminated soil/debris, PCB contaminated soil/debris and PCB waste contaminated with RCRA waste. The containers are securely covered with a reinforced tarpaulin.

PCB Storage Area

The TSDF maintains a waste management unit south of the transformer recycling shop for the storage of hazardous and non-hazardous waste in containers and tanks. Wastes received from off-site are staged in this area for inspection, testing and inventory. The area consists of a concrete slab, surrounded by a minimum six inch high curb that provides containment capacity of 64,000 gallons. The concrete slab is sealed with epoxy. The entire facility is covered by a roof for protection from the elements.

The PCB Storage Area is used mainly for staging 55-gallon containers and equipment received from the field or other ServCo facilities. The capacity for containers is as shown in Table 1. This area also houses an 8,000 gallon tanker trailer used for accumulating mineral oil (less than 50 ppm PCBs) destined for burning, and a 6,000 gallon tank used for storing used crankcase, lube, hydraulic engine oils and oily water. In addition, two holding tanks of 3,600 and 5,000 gallon capacities are maintained for the oil recycling operation. Access to the PCB Storage Area is provided through a 15 foot wide ramp located at the northeast corner of the area and three other man-gates. The floor of the staging area is pitched to a catch pump out sump. Located in the south-east corner of the PCB Storage Facility is a self contained HAZ-STOR Building for the storage of ignitable wastes (D001 and D001/D018) which may be contaminated with PCBs. The building can accommodate 15, 55 gallons drums for a total capacity of 825 gallons.

The HAZ-STOR building is designed specifically for the storage of Class I, II, III flammable/combustible liquids or hazardous wastes. The building is completely enclosed, self-supporting structure, made entirely of steel. No heavy equipment is used within the building. Below the floor grate structure is a secondary containment sump of 315 gallon capacity, or 38% of the maximum storage volume.

The HAZ-STOR building is also equipped with an automatic fire detection, alarm and suppression system. The fire suppression system is an ANSUL SPA-50 System. The system consists of a control unit, agent storage tank, actuator and agent distribution network. It operates automatically or manually and uses ANSUL FORAY, a free-flowing multipurpose dry chemical extinguishing agent.

Used Oil Storage Tank

Located within the PCB Storage Area is a 6,000 gallon used oil collection tank. Non PCB used oil generated at various ServCo facilities (i.e., used crankcase oil, lube oil, hydraulic oil, dielectric fluid, oily water, etc.) is transferred to the tank where it is stored prior to off-site disposal.

Mineral Oil Storage

Located within the PCB Storage Area and adjacent to the oil recycling shop, is an 8,000 gallon tanker trailer used for storage of non-hazardous dielectric fluids and dielectric fluids/water containing less than 50 ppm of PCBs (mineral oil).

The tanker trailer is located within the fully contained area of the PCB Storage Area. Inadvertent spills from this tanker would be contained within this area.

Dielectric Fluid Recycling Process Tanks

Six aboveground tanks are used in the dielectric fluid recycling process. The tanks alternately store either dielectric fluid or recycled dielectric fluid. All dielectric fluid handled in the recycling process are non-hazardous having a PCB content under 50 ppm and a flash point of that exceeds 290°F. NCDH Tank Nos. 3 and 4 are located in the PCB Storage Area and have the following capacities: 3,600 gallons and 5,000 gallons, respectively. Each of these tanks is a retrofitted transmission class transformer shell. Tanks 5, 6, 7 and 8 are located in the Transformer Shops Building and have a combined capacity of 10,000 gallons.

Container Storage

Within the containment of the PCB Storage Area, sufficient space is provided for the container storage of non-hazardous waste oil (<50 ppm PCBs), PCB containing waste oils (PCB's > 50 ppm), oily waters and waste generated from spills. In addition, PCB waste, when contaminated with a RCRA component, such as a listed or characteristic waste, is stored at this facility. Ignitables are stored in this area in the HAZ-STOR Containment Building described above.

Containers and equipment brought to this area are either pumped to respective tanks for bulk off site disposal or recycling or held for storage in containers for off-site disposal. Container capacity for this facility is 17,600 gallons.

3.4 Non-Hazardous Waste Storage

In addition to the non-hazardous waste stored in the units of the TSDF, non-hazardous waste is managed in roll-off containers. The pad area adjacent to the Annex III PCB Storage Facility has a capacity for the storage of four roll-off containers and the refuse unloading and dumpster area has the capacity for twenty 20-yd roll-off containers.

Additional non-hazardous waste management is described in Table 1A.